

RENE L. VALLADARES  
Federal Public Defender  
Nevada State Bar No. 11479  
JOY CHEN  
Assistant Federal Public Defender  
411 E. Bonneville, Ste. 250  
Las Vegas, Nevada 89101  
(702) 388-6577/Phone  
(702) 388-6261/Fax  
Joy Chen@fd.org

Attorney for Lauro Enrique Gonzalez-Nungaray

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

## LAURO ENRIQUE GONZALEZ-NUNGARAY.

**Defendant.**

Case No. 2:23-mj-00105-BNW

**STIPULATION TO CONTINUE  
TRIAL DATE  
(Third Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, and Imani Dixon, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Joy Chen, Assistant Federal Public Defender, counsel for Lauro Enrique Gonzalez-Nungaray, that the trial scheduled for February 21, 2024, be vacated and set to a date and time convenient to this Court, but no sooner than thirty (30) days.

The Stipulation is entered into for the following reasons:

1. Defense counsel received discovery on February 16, 2024.
  2. Defense counsel requires additional time to review discovery with Mr. Gonzalez-Nungaray and to counsel him on his legal options.

1       3.     Mr. Gonzalez-Nungaray is out of custody and does not oppose the continuance.

2       4.     The parties agree to the continuance.

3              This is the third stipulation to continue filed herein.

4              DATED this 20th day of February, 2024.

5       RENE L. VALLADARES  
6       Federal Public Defender

5       JASON M. FRIERSON  
6       United States Attorney

7       By /s/ Joy Chen  
8       JOY CHEN  
9       Assistant Federal Public Defender

7       By /s/ Imani Dixon  
8       IMANI DIXON  
9       Assistant United States Attorney

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
LAURO ENRIQUE GONZALEZ-  
NUNGARAY,  
Defendant.

Case No. 2:23-mj-00105-BNW

## FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

## FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Defense counsel received discovery on February 16, 2024.
  2. Defense counsel requires additional time to review discovery with Mr. Gonzalez-Nungaray and to counsel him on his legal options.
  3. Mr. Gonzalez-Nungaray is out of custody and does not oppose the continuance.
  4. The parties agree to the continuance.

## **CONCLUSIONS OF LAW**

The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant in a speedy trial, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for trial, taking into account the exercise of due diligence.

The continuance sought herein is excludable under the Speedy Trial Act, Title 18, United States Code, Section § 3161 (h)(7)(A), when the considering the factors under Title 18, United States Code, § 3161(h)(7)(B)(i), (iv).

## **ORDER**

IT IS THEREFORE ORDERED that trial briefs, proposed voir dire questions, proposed jury instructions, and a list of the Government's prospective witnesses must be electronically submitted to the Court by the 20 day of March , 2024.

IT IS FURTHER ORDERED that the trial currently scheduled for February 21, 2024, at the hour of 9:00 a.m., be vacated and continued to 3/27/2024 at the hour of 9 :00 a.m.

DATED this 21 day of February, 2024.

Berl Weller  
UNITED STATES MAGISTRATE JUDGE